

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN B. WILSON,

Defendant.

No. 1:19-cr-10080-LTS

**DEFENDANT JOHN WILSON'S MOTION FOR LEAVE TO FILE REPLY
AND TO FILE EXHIBIT UNDER SEAL IN SUPPORT OF
MOTION FOR ENTRY OF DISMISSAL WITH PREJUDICE**

Under Local Rule 7.1(b)(3), Defendant John Wilson respectfully moves for leave to file a reply in support of his motion for entry of dismissal with prejudice (Dkt. #2712). A copy of the reply Wilson requests to file is attached as Exhibit A. There is good cause for granting leave, because a concise reply would aid consideration of the arguments presented in the government's opposition (ECF No. 2727), and would not cause any delay of the Court's proceedings or prejudice any party. The government takes no position on this motion.

Mr. Wilson also moves under Local Rule 7.2 to file, under seal, a written statement as Exhibit 1 to the forgoing proposed reply. *See* Exhibit A, at 2 n.1. The statement contains sensitive and confidential matters pertaining to Mr. Wilson's family, and, therefore, it is appropriate that the statement be filed under seal. Mr. Wilson requests that the statement remain under seal until further order of the Court. If the Court grants leave to file Exhibit 1 to the reply under seal, Mr. Wilson will separately file it in ECF. The government takes no position on this motion.

DATED: August 28, 2023

Respectfully submitted:

Counsel for John Wilson

/s/ Michael Kendall

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, undersigned counsel certifies that he conferred with counsel for the government in a good-faith attempt to resolve the issues presented by this motion. Counsel for the government has indicated that the government takes no position on this motion.

/s/ Michael Kendall
Michael Kendall

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on August 28, 2023 through the ECF system, which will send true copies to all counsel of record.

/s/ Michael Kendall
Michael Kendall